

Message

From: McKeePerez, Nancy [McKeePerez.Nancy@epa.gov]
Sent: 3/7/2019 7:52:54 PM
To: Digaetano, Laurie [Benton-Digaetano.Laurie@epa.gov]; Annicella, Alan [Annicella.Alan@epa.gov]
Subject: RE: Can you clarify for me please?

I think MOOG is EPA lead.

Using the 2015 CMS as guidance, it looks like TSDs that are no longer in the operating universe that have yet to clean close (i.e. LDFs) are expected to be inspected every three years by either conducting a CEI, OAM or GME inspection. That being said, is NCDEQ meeting the requirement of inspecting LDFs every 3 year with either a CEI, OAM, or a GME?

With regard to GME inspections, it is recommended that they be conducted at any new or newly regulated LDF. Once it is determined that the groundwater monitoring system is adequately designed and installed, an OAM may become the appropriate inspection.

More frequent GMEs should be conducted in certain situations, such as:

- those involving complex compliance or CA requirement
- inadequate groundwater monitoring systems
- significant changes to groundwater monitoring systems
- actual or suspected changes in local groundwater regimes

Nancy

From: Digaetano, Laurie
Sent: Wednesday, March 6, 2019 2:02 PM
To: Annicella, Alan <Annicella.Alan@epa.gov>
Cc: McKeePerez, Nancy <McKeePerez.Nancy@epa.gov>
Subject: RE: Can you clarify for me please?

Essentially, all of NC DEQ's TSDs (including LDFs) have received a CEI within the past three years. NC DEQ uses the NRR code for groundwater inspections. I believe that LDFs are required to have a groundwater inspection once every three years. If so, NC DEQ hasn't met that commitment.

The most recent groundwater inspections at LDFs exceeding the 3-years are:

10/23/2014 – Brentag
05/01/2015 – Dynapar
08/25/2011 – General Timber
05/14/2013 – Kaba ILCO
02/01/2013 – MOOG
04/06/2013 – Old Asheville Dye
Never – Three Mountaineers (bankrupt)

From: Annicella, Alan
Sent: Wednesday, March 6, 2019 8:56 AM
To: Digaetano, Laurie <Benton-Digaetano.Laurie@epa.gov>
Cc: McKeePerez, Nancy <McKeePerez.Nancy@epa.gov>
Subject: Can you clarify for me please?

Hi Laurie,

In your NC PAM review there is this statement... Can you clarify this for me please.

For FY2018, the NCDEQ has met the overall FY2018 work plan goal to conduct 25 compliance evaluation inspections (CEIs) and 22 NRR CEIs at Land Disposal Facilities (LDFs). The NCDEQ met these inspection commitments by conducting CEIs at 44 LDFs and one or more NRR inspections at 29 LDFs. Furthermore, none of the facilities in this universe have exceeded the three-year time limit for receiving an inspection. However, it appears that greater than three years have passed since the last NRR inspection at the following LDFs: Brenntag Mid-South (NCD003471158), Dynapar Corporation (NCD041455251), General Timber (NCD057034449), Kaba ILCO Corporation (NCD045646924), MOOG Components (NCD044438406), and Old Asheville Dye and Finishing (NCD070619663).

Alan

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